## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

## AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff Solas OLED Ltd., with the agreement of Defendants Samsung Display Co., Ltd., Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc., respectfully submits the attached proposed Protective Order for the Court's signature.

Respectfully submitted,

Dated: November 20, 2019 /s/ Neil A. Rubin

Marc Fenster (CA SB No. 181067) Reza Mirzaie (CA SB No. 246953) Neil A. Rubin (CA SB No. 181067) Kent N. Shum (CA SB No. 259189) Theresa Troupson (CA SBN 301215) RUSS AUGUST & KABAT 12424 Wilshire Boulevard 12th Floor

Los Angeles, California 90025 Telephone: 310-826-7474

Facsimile: 310-826-6991
E-mail: mfenster@raklaw.com
E-mail: rmirzaie@raklaw.com
E-mail: nrubin@raklaw.com
E-mail: kshum@raklaw.com
E-mail: ttroupson@raklaw.com

Sean A. Luner CA State Bar No. 165443

Gregory S. Dovel

CA State Bar No. 135387
Jonas B. Jacobson
CA State Bar No. 269912
DOVEL & LUNER, LLP
201 Santa Monica Blvd., Suite 600
Santa Monica, CA 90401
Telephone: 310-656-7066
Email: sean@dovel.com
Email: greg@dovel.com
Email: jonas@dovel.com

T. John Ward, Jr.
Texas State Bar No. 00794818
E-mail: jw@wsfirm.com
Claire Abernathy Henry
Texas State Bar No. 24053063
E-mail: claire@wsfirm.com
Andrea L. Fair
Texas State Bar No. 24078488
E-mail: andrea@wsfirm.com
WARD, SMITH & HILL, PLLC
PO Box 1231
Longview, Texas 75606-1231
(903) 757-6400 (telephone)
(903) 757-2323 (facsimile)

ATTORNEYS FOR PLAINTIFF SOLAS OLED, LTD.